

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

HSA ST. JOSEPH LLC

v.

CLINT SOSA

Case No. 4:25-cv-01411

**DECLARATION OF JAIME MALVEAUX
IN SUPPORT OF THE TEMPORARY RESTRAINING ORDER**

I, Jaime Malveaux, hereby declare under penalty of perjury that, to the best of my knowledge and belief, and after reasonable inquiry, the following is true and correct:

1. I am the Human Resources Director of HSA St. Joseph, LLC which owns and operates St. Joseph Medical Center (SJMC) in Houston, Texas.
2. I submit this declaration (the "Declaration") in support of the SJMC. Except as otherwise stated in this Declaration, I have personal knowledge of or have relied upon the knowledge of others employed by HSA with respect to the matters set forth herein.
3. Clint Sosa was hired by SJMC on November 25, 2024 as a communications director on a probationary basis for ninety days.
4. As part of his duties, Sosa accessed and maintained the passwords and multi-factor authentication (MFA) of the X, Facebook, LinkedIn and other social media and web accounts owned by SJMC.
5. Sosa was terminated on March 4, 2025 and was no longer authorized by SJMC to access or maintain these accounts, their content, followers or data.
6. Despite my request, Sosa has not provided the passwords nor MFA methods to access the accounts.
7. On March 25, 2025, when asked to provide access as he is no longer authorized,

Sosa demanded a consulting contract.

8. SJMC has refused to pay this demand and reiterates its immediate right to access the accounts for SJMC and HSA hospitals.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 27, 2025
Houston, Texas

HSA St. Joseph, LLC


Jaime Malveaux
Human Resources Director